

May 9, 2018

via ECFS and e-mail

Zenji Nakazawa
Public Safety and Consumer Protection Advisor
Office of Chairman Pai
Federal Communications Commission

**Re: Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities • CG Docket No. 03-123
Misuse of Internet Protocol (IP) Captioned Telephone Service • CG Docket
No. 13-24**

Dear Mr. Nakazawa,

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI) and the Hearing Loss Association of America (HLAA) respectfully urge the Commission to grant the request of Hamilton Relay, Inc. in the above-referenced dockets to pilot the public release of any pending draft item related to Internet Protocol (IP) Captioned Telephone Service (IP-CTS) slated to be voted on circulation rather than at an Open Meeting with sufficient time for the public to comment on elements of the draft.¹ The Commission's 2013 Further Notice of Proposed Rulemaking in the dockets raises a number of significant issues about the structure and operation of IP-CTS and it is critical that the Commission afford stakeholders the opportunity to comment on any tentative conclusions in a draft item that may have significant implications for millions of Americans who are hard of hearing and rely on IP CTS to communicate with friends, family, colleagues, and others on equal terms.² We agree with Hamilton that allowing stakeholders to review and comment on any draft item would serve the public interest by promoting transparency and ensuring equal access to the administrative process.³

Please don't hesitate to contact me if you have any questions.

¹ See Hamilton Ex Parte, 1-2 (March 22, 2018), <https://www.fcc.gov/ecfs/filing/10322540617649>.

² See generally Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd. 13,420 (Aug. 26, 2013), https://apps.fcc.gov/edocs_public/attachmatch/FCC-13-118A1_Rcd.pdf.

³ See Hamilton Ex Parte at 1-2.

Respectfully submitted,

/s/

Blake E. Reid

*Counsel to Telecommunications for the Deaf and
Hard of Hearing, Inc. (TDI)*

Samuelson-Glushko Technology Law &
Policy Clinic

blake.reid@colorado.edu

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)

Claude Stout, Executive Director • cstout@TDIforAccess.org

8630 Fenton Street, Suite 121, Silver Spring, MD 20910

www.TDIforAccess.org

Hearing Loss Association of America (HLAA)

Barbara Kelley, Executive Director • bkelley@hearingloss.org

Contact: Lise Hamlin, Director of Public Policy, LHamlin@Hearingloss.org

7910 Woodmont Avenue, Suite 1200, Bethesda, MD 20814

301.657.2248

www.hearingloss.org

CC:

Brooke Ericson and Amy Bender, Office of Commissioner O’Rielly

Neşe Guendelsberger, Office of Commissioner Clyburn

Jamie Susskind, Office of Commissioner Carr

Travis Litman, Office of Commissioner Rosenworcel

Karen Peltz Strauss, Consumer and Governmental Affairs Bureau

Eliot Greenwald, Disability Rights Office

Dixie Ziegler, Hamilton Relay, Inc.

David A. O’Connor, Wilkinson Barker Knauer, LLP (Counsel for Hamilton Relay, Inc.)